

Approved: ANDREW DeFILIPPIS / JANE KIM / SAM ADELSBERG
Assistant United States Attorneys

Before: HONORABLE LISA MARGARET SMITH
United States Magistrate Judge
Southern District of New York

- - - - - X
: COMPLAINT
UNITED STATES OF AMERICA :
: Violations of 18 U.S.C.
- v. - : §§ 875, 115, and 2.
: KAMRAN FARIDI, : COUNTY OF OFFENSE:
: WESTCHESTER
Defendant. :
- - - - - X

20mj2437

SOUTHERN DISTRICT OF NEW YORK, ss.:

KEVIN T. LARKIN, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and a member of the FBI's Joint Terrorism Task Force ("JTTF"), and charges as follows:

COUNT ONE

(Threatening Interstate Communications)

1. In or about February 2020, in the Southern District of New York and elsewhere, KAMRAN FARIDI, the defendant, knowingly transmitted in interstate and foreign commerce a communication containing a threat to injure the person of another, to wit, FARIDI sent multiple death threats to federal agents by email and text message.

(Title 18, United States Code, Sections 875(c) and 2.)

COUNT TWO

(Threatening to Assault a Federal Law Enforcement Officer)

2. In or about February 2020, in the Southern District of New York and elsewhere, KAMRAN FARIDI, the defendant, did threaten to assault and murder a federal law enforcement officer, with intent to impede, intimidate, and interfere with such federal

law enforcement officer while he was engaged in the performance of his official duties, to wit, FARIDI sent multiple death threats by email to an FBI Special Agent ("Agent-1") in Westchester, New York.

(Title 18, United States Code, Sections 115(a)(1)(B) and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI and a member of the FBI's New York-based JTTF, and I have been personally involved in the investigation of this matter. This affidavit is based in part upon my conversations with law enforcement agents and other people, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

4. Between in or about February 17, 2020, and in or about February 19, 2020, KAMRAN FARIDI, the defendant, sent over 100 messages to Agent-1, an FBI Special Agent assigned to an FBI field office in the Southern District of New York, a JTTF Task Force Officer with the Westchester County Police D ("Officer-1"), and a retired FBI Special Agent ("Retired Agent-1"). For example:

a. On or about February 18, 2020, FARIDI sent an email to Agent-1, stating: "You will payback for my family suffering my friends get hurt."

b. On or about February 18, 2020, FARIDI sent an email to Agent-1, stating: "Moral of the story door fuck the guy who have nothing to loose [sic]. Fuk [sic] this life. You love it. I am ready to die. Wanting to die. Because what you did to my friends and my family[.]"

c. On or about February 18, 2020, FARIDI sent an email to Agent-1, stating: "Now. I am pissed. And willing to die. For My right. And wallah I rather die now. To take more abuse and lie from You. Allah ho Akbar kabberah."

d. On or about February 18, 2020, FARIDI sent an email to Agent-1, stating in part: "Pay back time I'll be sipping latte. On beach. In. Pakistan. I'll Make sure you have. Rest of your life hide your face from People for taking my cancer patient wife. Sick parents. Medicine money."

e. On or about February 18, 2020, FARIDI sent an email to Agent-1 and Officer-1, with the subject "I wish you were on my face now," and stating in part: "I rip your heart out with my bear hands[.] For what you put my dying wife through. Ahh hole."

f. On or about February 18, 2020, FARIDI sent an email to Agent-1, stating in part:

If any un mark car follow me like you. did before I fell cornered. I will shoot them. Don't gave a fuck who. I'll let court decide. Not you. I am. Armed. Heavy. And ready to shoot who ever try to intrude[.] No games no more tail. Ass hole warning you

g. On or about February 18, 2020, FARIDI sent an email to Retired Agent-1, stating in part: "What wepon [sic] You know I posses [sic] And any other car came around or stop I am shooting don't have a fuck."

5. Based on my review of records from the Florida Crime Information Center and the Florida Department of Agriculture and Consumer Services, I know that KAMRAN FARIDI, the defendant, possesses a concealed carry permit issued by the State of Florida and owns two firearms.

6. Based on my conversations with Agent-1, I know, among other things, the following:

a. Agent-1 was located in the Southern District of New York when he received a number of the above-referenced messages from KAMRAN FARIDI, the defendant.

b. Agent-1 received these messages from FARIDI on Agent-1's FBI email account.

c. FARIDI appears to have been in Florida when he sent the messages to Agent-1.

WHEREFORE, your deponent respectfully requests that a warrant be issued for the arrest of KAMRAN FARIDI, the defendant,

and that he be arrested and imprisoned, or bailed, as the case may be.

/s/ Kevin Larkin

Special Agent Kevin T. Larkin
Federal Bureau of Investigation
Joint Terrorism Task Force

Sworn to before me this
2nd day of March 2020

/s/ Lisa Margaret Smith

HONORABLE LISA MARGARET SMITH
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

A large, stylized handwritten signature in black ink, reading "Lisa Margaret Smith". The signature is written over the printed name and extends to the right.